

Robert Yaquinto, Jr.
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ATTORNEY FOR TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:

PREMISE MEDIA HOLDINGS, LP

DEBTOR

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CASE NO. 09-38751-BJH-7

**MOTION TO CONFIRM AND APPROVE SALE OF PROPERTY OF ESTATE
FREE AND CLEAR OF LIENS AND ENCUMBRANCES**

TO THE HONORABLE BARBARA J. HOUSER, U.S. BANKRUPTCY JUDGE:

Robert Yaquinto, Jr., trustee, files this motion to confirm and to approve sale of the property of the estate and clear of liens and encumbrances with any liens and encumbrances to attach to the proceeds of sale and in support, respectfully shows the Court the following:

1. On December 29, 2009, **PREMISE MEDIA HOLDINGS, LP** (“Debtor”), filed its voluntary petition for bankruptcy under Chapter 7 of Title 11 of the United States Bankruptcy Code. Robert Yaquinto, Jr. was subsequently appointed Trustee of the bankruptcy estate.

2. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §363. This is a core proceeding.

3. The assets of the estate included, but were not limited to, two cameras, an editing computer and a SteadyCam, all of which were located at 17744 Preston Road, Suite 100, Dallas, TX 75252.

4. On May 14, 2010 Trustee filed a Motion to Sell and a Motion to Shorten Notice because the auction was scheduled for May 25, 2010.

5. Prior to the sale, several items of equipment were stolen from Auctioneer's premises. Trustee mistakenly withdrew his Motion to Sell due to confusion over what was stolen and what, if anything, remained. Some computer equipment was pre-sold to individuals in possession of the equipment, based on its age, its anticipated value and the cost of recovery for auction. Some of the assets were sold at auction and are described in the Report of Sale.

6. A claim was filed by the Auctioneer with its insurance carrier for the stolen property.

7. Trustee desires to confirm sale of the property, which is listed on the attached exhibit A.

WHEREFORE, Robert Yaquinto, Jr., trustee, seeks an Order from the Court confirming the sale of the property of the estate; and for such other and further relief, both at law and in equity, to which the estate may be justly entitled.

ANY PARTY WISHING TO RESPOND TO THIS NOTICE MUST FILE THE RESPONSE WITH THE U.S. BANKRUPTCY CLERK, 1100 COMMERCE STREET, ROOM 1254, DALLAS, TEXAS 75242, AND SERVE A COPY ON THE TRUSTEE AT 509 N. MONTCLAIR AVENUE, DALLAS, TEXAS 75208, WITHIN 24 DAYS OF THE SERVICE OF THIS NOTICE.

IF A RESPONSE IS FILED AND SERVED TIMELY, A HEARING WILL BE SCHEDULED WITH NOTICE TO THE RESPONDING PARTY ONLY. IF NO RESPONSE IS FILED AND TIMELY SERVED ON THE TRUSTEE, THE COURT MAY DEEM THIS NOTICE UNOPPOSED AND MAY ENTER AN ORDER GRANTING THE RELIEF REQUESTED WITHOUT FURTHER NOTICE TO ANY PARTY.

Respectfully submitted,

/s/ Robert Yaquinto, Jr.
Robert Yaquinto, Jr.
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ATTORNEY FOR TRUSTEE

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the *Motion to Confirm Sale of Property of Estate Free and Clear of Liens, Encumbrances and Interests* has been forwarded by electronic transmission to the United States Trustee, 1100 Commerce Street, Room 976, Dallas, TX 75242 and by electronic transmission or regular U.S. Mail, postage prepaid to those parties included on the attached Service List, on this 14th day of January, 2011.

/s/ Robert Yaquinto, Jr.
Robert Yaquinto, Jr.

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